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9 Attorneys for X Corp., successor in interest to named defendant Twitter, Inc.

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA

12 RICHARD JACKSON, JULIE
BRIGGS, and GREGG
13 BUCHWALTER, Individually And On
Behalf Of All Others Similarly Situated,

14 Plaintiffs,

15 vs.

16 TWITTER, INC., a Delaware
corporation; GOOGLE, LLC, a limited
17 liability company; ALPHABET, INC., a
Delaware corporation; META
18 PLATFORMS, INC., a corporation
doing business as "META" and
19 "FACEBOOK, INC."; INSTAGRAM,
INC., a Delaware corporation;
20 AMAZON INC., a Delaware
corporation; YOUTUBE INC., a
21 Delaware corporation; APPLE, INC., a
Delaware corporation; AMERICAN
22 FEDERATION OF TEACHERS;
NATIONAL EDUCATION
23 ASSOCIATION; NATIONAL
SCHOOL BOARD ASSOCIATION;
24 DNC SERVICES CORPORATION, a
corporation doing business nationwide
25 as, "THE DEMOCRATIC NATIONAL
COMMITTEE" OR "DNC,"
26

27 Defendants.
28

CASE NO. 2:22-cv-09438-AB (MAA)

**DECLARATION OF TANYA L.
GREENE IN SUPPORT OF JOINT
STIPULATION REGARDING
FILING OF FIRST AMENDED
COMPLAINT AND CONTINUING
SCHEDULING CONFERENCE**

Complaint Filed: December 29, 2022

DECLARATION OF TANYA L. GREENE

I, Tanya L. Greene, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with McGuireWoods LLP, attorneys of record for X Corp., successor in interest to named defendant Twitter, Inc (“Twitter”). If called as a witness, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief. This declaration is submitted in support of the Joint Stipulation Regarding Filing of First Amended Complaint and Continuing Scheduling Conference (the “Joint Stipulation”).

2. On April 12, 2023, the Court set the Scheduling Conference for June 23, 2023 (ECF No. 35).

3. On April 26, 2023, a Joint Stipulation to Continue Scheduling Conference was filed, which requested that the Scheduling Conference be continued to June 30, 2023 (ECF No. 44).

4. On April 27, 2023, the Court granted the Joint Stipulation to Continue Scheduling Conference, continuing the Scheduling Conference until June 30, 2023 (ECF No. 58).

5. On May 1, 2023, Michael Reznick, counsel for Plaintiffs Richard Jackson, Julie Briggs, and Gregg Buchwalter (“Plaintiffs”), advised of his intent to file an amended complaint in the above-captioned matter.

6. After conferring among the parties, the parties agreed to stipulate to permit Plaintiffs to file a First Amended Complaint by May 24, 2023.

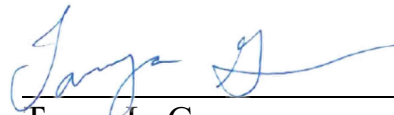
7. Defendants have all filed Motions to Dismiss the current Complaint. Twitter has also filed a Motion to Strike Class Action Claims and Allegations. All said motions are set to be heard on June 9, 2023 (“Motions Hearing”).

8. Twitter, as well as other defendants, may file renewed motions in response to Plaintiffs’ anticipated First Amended Complaint.

1 9. To promote efficiency, the parties all agree that, subject to the Court's
2 approval, the Motions Hearing set for June 9, 2023 and the Scheduling Conference
3 set for June 30, 2023 shall be vacated and the Motions Hearing rescheduled to a date
4 set by Defendants with the Court at the time of filing of any renewed motions and
5 the Scheduling Conference shall be rescheduled to a date after any renewed motion
6 to dismiss briefing is complete regarding the First Amended Complaint.

7 10. There has been one previous continuance of the Scheduling Conference
8 due to the unavailability of co-defendants' counsel on the originally scheduled date
9 of June 23, 2023 (ECF Nos. 44, 44-1).

10 I declare under penalty of perjury that the foregoing is true and correct.
11 Executed on May 11, 2023.

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Tanya L. Greene